



## BUSINESS ETHICS and COMPLIANCE POLICY

W International (W) operates to a high standard of Ethics that, ultimately, make our Company and reputation outstanding. This is achieved by dealing fairly with our Customers, Suppliers, as well as Each Other. Accordingly, we all need to strive to be:

- Law Abiding
- Honest and Trustworthy- Truth Telling
- Responsible and Reliable- Integrity
- Fair and Responsive
- Non-Discriminatory - Respect Others

Compliance refers to the laws, rules, regulations, and polices that control and direct both our personal actions and that of the Company.

The details below of our Ethics and Compliance Policy are available on the W website, our internal Server, and in our Human Resources department.

Here are some very important items for all of us to focus on in order to assure Compliance and reflect our high Ethical values:

### Rules and Regulations:

- We will not make agreements that violate Anti-Trust and Competition laws.
- Our own private and personal interests, business connections, and decision making cannot or appear to provide a Conflict of Interest with the business interests of the Company.
- Generally, our Employees should not accept or give Gifts, Meals, or Entertainment to/ from those whom we do business with. When a business situation dictates, we may accept



/provide meals or small value gifts; if of little or no intrinsic value.

- We do not engage in any bribes or kick-back activity with our Customers or Government officials; US or a Foreign country.
- Any technical data provided to us that is controlled by the International Traffic in Arms Regulation (ITAR) may not be exported to a foreign person, either in the US or abroad without a license or exception from the US Department of State.
- We must always Obey the Law; locally and nationally. We deal in a highly regulated environment which dictates how we conduct our business. Accordingly, we will co-operate with any US Government inspection or investigation

#### Adherence:

- We will disclose any or suspected wrong doing in accordance with our established Malpractice policy and procedure.
- The Quality of our products is crucial to our success. All parts and products we produce must meet all inspection, testing, and quality criteria in accordance with the Purchase Order requirements of our Customer. All test documentation must be completed accurately and promptly.
- We must all keep Accurate Records of quality criteria, material receipts serialization, and financial and business transactions.
- We will deliver Products to our Customers that are compliant and as promised.
- Pricing and Billings to Customers must be clear and accurate.
- All Employees will charge their Time and Expenses accurately and in accordance with our Accounting procedures.



## Working Together:

- W is an Equal Employment Opportunity (EEO) employer as stated in our hiring and employment policy. Our practice is to provide an environment where all individuals may grow, contribute, and work free of Discrimination. Together, we must treat our fellow employees equally regardless of race, color, religion, age, sex, pregnancy, national origin, veteran /military status, political affiliation, sexual orientation, gender identity, or other projected status. Our Employee are all protected by the EEO policy and regulations.

These protections extend to all Company practices and decisions; including recruitment, and hiring practices, performance assessments, promotions, and career development and training.

You can report any Incident of non -EEO compliance to your immediate Supervisor, department Manager, or the Human Resources dept. Also, any Employee who thinks he or she has been subject to discrimination or retaliation may contact the US Equal Employment Opportunity Commission office directly at 202.663.7081 or, as appropriate, the Office of Special Counsel at 201.254.3600.

- W maintains a workplace that is free from the use of illegal Drugs or abuse of controlled substances while Employees are engaged in performance of Company business.
- Harassment that discriminates against fellow workers equal rights, is sexual in nature, or represents other disruptive behavior affecting other employees will not be tolerated.
- Safety and Health is important to all of us. Accordingly, we must follow the all applicable laws and jurisdictions. We are to



report and record any safety hazards and accidents. Smoking is not allowed within the facility.

- W will not tolerate Violent Behavior in our workplace by or to our employees; threatening remarks, causing physical injury, intentionally damaging someone else's property, or acting in a way that causes someone to fear injury.
- Any violation of our EEO, Drug abuse, Harassment, Health or Safety, or Violent Behavior policies should be reported to your immediate Supervisor or our Human Resources department.

#### Property Protection:

- The Assets and Resources of W are to be utilized primarily for business purposes. These resources include but are not limited to: telephones, electronic mail, Internet access, voicemail, computers of any kind, plant equipment, machinery, and vehicles. Managers may authorize infrequent use of W assets on an afterhours basis.
- Intellectual Property is a valuable asset whether it belongs to W or to others; including our Customers. We must protect and respectively use this matter which includes; copyrights, patents, proprietary data, trade secrets, ideas, inventions, and processes.
- W strives to keep all Employee Data confidential and used for business or required reporting purposes only. If you have access to such data, you must keep it confidential and protected from disclosure. If there is ever a question of doubt, contact Human Resources.